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Counsel for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF TEUTA FANI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF GOOGLE LLC'S
RESPONSE TO THE COURT'S
OCTOBER 27, 2022 ORDER TO SHOW
CAUSE (DKT. 784)**

Judge: Hon. Susan van Keulen, USMJ

1 I, Teuta Fani, declare as follows:

2 1. I am a member of the bar of the State of Illinois and an attorney for Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I have
4 been admitted pro hac vice in this matter. (Dkt. 234). I make this declaration of my own personal,
5 firsthand knowledge, and if called and sworn as a witness, I could and would testify competently
6 thereto.

7 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
8 LLC’s Administrative Motion to Seal portions of Google LLC’s Response to the Court’s October
9 27, 2022 Order to Show Cause (Dkt. 784) (“Google’s Motion”). In making this request, Google has
10 carefully considered the relevant legal standard and policy considerations outlined in Civil Local
11 Rule 79-5. Google makes this request with the good faith belief that the information sought to be
12 sealed consists of Google’s confidential and proprietary information and that public disclosure could
13 cause competitive harm.

14 3. Google respectfully requests that the Court seal the redacted portion of Google
15 LLC’s Response to the court’s October 27, 2022 Order to Show Cause (Dkt. 784) (“Google’s
16 Motion”).

17 4. The information requested to be sealed contains Google’s confidential and
18 proprietary information regarding highly sensitive features of Google’s internal systems and
19 operations, including details regarding Google’s internal projects, data bases, data signals, and their
20 proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the
21 ordinary course of its business and is not generally known to the public or Google’s competitors.

22 5. Such highly confidential and proprietary information reveals Google’s internal
23 strategies, system designs, and business practices for operating and maintaining many of its
24 important services, and falls within the protected scope of the Protective Order entered in this action.
25 *See* Dkt. 81 at 2-3.

26 6. Public disclosure of such highly confidential and proprietary information could affect
27 Google’s competitive standing as competitors may alter their system designs and practices relating
28 to competing products, time strategic litigation, or otherwise unfairly compete with Google. It may

1 also place Google at an increased risk of cyber security threats, as third parties may seek to use the
2 information to compromise Google's data logging infrastructure.

3 I declare under penalty of perjury of the laws of the United States that the foregoing is true
4 and correct. Executed in in Marina del Rey, California on November 30, 2022.

5
6 DATED: November 30, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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8
9 By /s/ Teuta Fani

10 Teuta Fani

11 Attorney for Defendant
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